



4/1/91

MEMORANDUM

SUBJECT: Chemical Processors, Inc. Pier 91 Facility
WAD 00981 ~~2317~~ 2917
Follow-up to 12/5/90 Compliance Evaluation Inspection

FROM: S. Burges *SB 4/1/91*

TO: Files

Following an unsuccessful attempt by the inspector to obtain information to follow up on issues raised in EPA's December 5, 1990 compliance evaluation inspection, I contacted Chemical Processors, Inc. (Chempro) personnel directly to request additional information. Chempro indicated that they often have trouble with nondelivery of mail addressed to the Pier 91 facility and agreed to provide information as follows:

1. A diagram of the piping layout for the facility, clearly distinguishing between lines used by Chempro and those used by Pacific Northern Oil Company (PANOCO), as the piping existed prior to the Nov. 23, 1990 boiler explosion. If changes have been made subsequent to that incident, a current piping layout.
2. Copies of all police and fire department reports on the Nov. 23, 1990 boiler explosion.
3. Copies of any reports on the Nov. 23, 1990 incident prepared by Chempro pursuant to 40 CFR 265.56.
4. Data on the contents of all tanks under Chempro control.
5. Analytical data on the tank sediments removed from Chempro's Pier 91 tanks in the past six months.
6. A description of the waste oil treatment processes used at your facility, including the chemical names and quantities of all treatment chemicals used during the past year.
7. The approximate number, volume, and nature of samples stored in the two storerooms visited during the Dec. 5, 1990

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stored in the two storerooms visited during the Dec. 5, 1990 inspection and all data supporting waste determinations on these samples, including all analytical data and the date of analysis. (One storeroom was located at the north end of the PANOCO shop area and contained samples labeled Exxon Valdez, 1989; the other was behind the Chempro lab.)

Following initial evaluation of the response to this request, additional information and clarifications were requested by phone:

1. A copy of the most recent part A application.
2. Copies of 1990 generator and facility reports submitted to Ecology.
3. Information on the meaning of sample analysis codes and a statement as to whether the samples were hazardous waste.
4. The results of waste characterization for sediments removed from the tanks in recent cleaning operations and how the sediment was disposed.
5. The 1990 annual productions.

Once the information had been received and reviewed by program staff, assistance was requested by the Environmental Service Division to evaluate portions of the additional information. Specifically, we requested that someone knowledgeable about process chemistry evaluate the information on processes and amounts of chemicals used annually to determine if Chempro is in compliance with their part A application. We also requested that ESD review the piping diagrams to evaluate the potential for illegal transfers between Chempro and Pacific Northern Oil.

On 3/29/91 Doug Smith returned the materials we had submitted for ESD review, indicating that while he believed that these materials should be reviewed by the inspector prior to the next inspection, the ESD review had not identified any potential violations at present.

Program review of the reports related to the boiler explosion incident likewise revealed no potential violations. The samples maintained at the facility are not hazardous wastes subject to RCRA regulations.